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Of Attorneys for Robert West

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

ROBERT LEE WEST

Plaintiff,

v.

MAYOR HALES, CHIEF OF POLICE REESE,  
and 150 OFFICERS,

Defendants.

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Case No. 3:15-cv-00715-ST

DECLARATION OF GREG LOCKWOOD  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR AN EXTENSION OF TIME TO FILE  
AN AMENDED COMPLAINT

I, Greg Lockwood, hereby make the following declaration pursuant to 28 U.S.C. § 1746. I make this declaration on personal knowledge and, if called upon to do so, I could and would competently testify to the following matters.

1. I am the appointed attorney for Robert West and I received my appointment from this court on June 24, 2015.
2. Since accepting an appointment, I had a jury trial in Multnomah County Circuit court on July 6 and 7. I also had an arbitration on July 15. In the past few weeks, I had several other cases with deadlines for motions.
3. All of these things have limited the time that I have been able to dedicate to rewriting plaintiff's complaint.

4. For the past few weeks, I have been in communication with representatives from the City of Portland to discuss settlement. I believe that there may be an opportunity to resolve this matter without litigation. And, Mr. West would like me to investigate those avenues.

5. For the foregoing reasons, a 45-day extension to September 4, 2015 is warranted and would provide me with the time needed to further investigate settlement and prepare the complaint, if necessary.

*I declare under penalty of perjury that the foregoing is true and correct.*

DATED: July 16, 2015.

HITT HILLER MONFILS WILLIAMS LLP

By: /s/ Greg Lockwood  
Greg Lockwood, OSB No. 114415  
Attorney for Plaintiff